

EXHIBIT 1.5 TO DECLARATION OF CARL M. VARADY

***Carl M. Varady***

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May 18, 2008

**Attention:**

File #: Loveland-PAL

Inv #: Sample

**RE:** Billing Dispute with DOE

DATE	DESCRIPTION	HOURS	RATE	AMOUNT	LAWYER
May-02-02	Research and Draft Pleadings : read protest letter from T Donkervoet and begin research on bid protest regulations and whether gag clause can be challenged in admin process	2.40	\$275.00	660.00	CMV
May-13-02	Research and Draft Pleadings ; Being research on statutory purchasing requirements and review existing CAMHD contract	5.60	\$275.00	1,540.00	CMV
May-20-02	Research and Draft Pleadings :read 12/11/98 letter from E Seitz to AG Suzuki and Special Master re placement of children in private schools and applicability of stay-put and P Dukes's draft to P Hamamoto of 5/20/02 raising similar issues in relation to RFP and suggest revisions	1.10	\$275.00	302.50	CMV
Jun-13-02	Research and Draft Pleadings : read attorney-parent's analysis of e stay put and possible modifications to contract that would avoid gag clause by incorporating best practices and clinical standards manual, research standards	0.60	\$275.00	165.00	CMV
Jun-14-02	Research and Draft Pleadings Meeting with Loveland Academy owner, Patty Dukes to review contract terms for interim	2.50	\$275.00	687.50	CMV

	agreement and supplemental legal analysis provided by L. Nishioka				
Jun-18-02	Research and Draft Pleadings : continue research on conflicting contract terms, purchasing regulations and begin drafting letter to C. Ito re proposed interim agreement	1.20	\$275.00	330.00	CMV
	Research and Draft Pleadings : research conditions for interim contract and draft letter to Chris Ito re interim contract and proposing changes and addendum for client's review and comment	2.30	\$275.00	632.50	CMV
Jun-19-02	Research and Draft Pleadings : meet with Loveland Academy owner, Patty Dukes to discuss research and revise Ito letter	1.30	\$275.00	357.50	CMV
	Research and Draft Pleadings : discuss revisions with client, research regulation for state purchasing and revise letter to Chris Ito	0.90	\$275.00	247.50	CMV
Jun-20-02	Research and Draft Pleadings Telephone conference(s) with defense counsel T. Baker and with Loveland Academy owner, Patty Dukes regarding billing issues	0.30	\$0.00	0.00	CMV
Jun-24-02	Research and Draft Pleadings : read prior and new IEP for client demonstrating DOE's refusal to include mental health as component of services and redefinition of autism services as School Based Behavioral Health,	0.40	\$275.00	110.00	CMV
Jun-25-02	Research and Draft Pleadings Telephone conference(s) with B. Bateman re refusal to pay as stay put violations	0.40	\$275.00	110.00	CMV
Jun-26-02	Research and Draft Pleadings : read OSEP report re state compliance with IDEA and joint house and senate committee report re state's compliance with Felix and change from mental health to SBBH	1.25	\$275.00	343.75	CMV
Jun-28-02	Research and Draft Pleadings Review State Auditor's report re autism services and contact OSEP in D.C. re same	0.50	\$275.00	137.50	CMV
	Research and Draft Pleadings : read	1.40	\$275.00	385.00	CMV

	auditor's report critiquing DOE send memo to P. Dukes re need for parents to follow up with legislators re change from mental health to SBBH				
Jul-01-02	Research and Draft Pleadings Telephone conference(s) with F. Lopez at OSEP re state's refusal to pay for services for IEP and settlement students Telephone conference(s) with J. Gregorian at OSEP re same	0.70	\$275.00	192.50	CMV
Jul-15-02	Research and Draft Pleadings Legal research re refusal to fund services as constituting a change in placement	2.40	\$275.00	660.00	CMV
Jul-17-02	Research and Draft Pleadings Draft standardized IEP questions for parents whose children attend Loveland to address placement issue	0.50	\$275.00	137.50	CMV
Jul-22-02	Research and Draft Pleadings : research stay put issues to determine viability of direct action in federal court	2.75	\$275.00	756.25	CMV
Jul-23-02	Research and Draft Pleadings : continue researching stay put issues and litigation options	1.80	\$275.00	495.00	CMV
Jul-24-02	Research and Draft Pleadings : continue researching stay put issues	1.90	\$275.00	522.50	CMV
Aug-09-02	Research and Draft Pleadings : Further research for case law construing placement and payment for placement as same	3.20	\$275.00	880.00	CMV
Sep-12-02	Research and Draft Pleadings : Review outstanding unpaid invoices and draft letter re same to C. Butt	0.75	\$275.00	206.25	CMV
	Research and Draft Pleadings : draft and revise demand letter to Chris Butt	1.20	\$275.00	330.00	CMV
Sep-13-02	Research and Draft Pleadings Review proposal and draft memo to Loveland Academy owner, Patty Dukes re gag-clause provisions	0.50	\$275.00	137.50	CMV
Sep-14-02	Research and Draft Pleadings Telephone conference(s) with Loveland Academy owner, Patty Dukes re proposal made by	0.50	\$275.00	137.50	CMV

	DOE for contract and possible terms that could be used to create 20-bed minimum in lieu of proposed interim contract				
Sep-26-02	Research and Draft Pleadings : discuss gag clause language with client and possible legal challenge based on First Amendment limitations	0.60	\$275.00	165.00	CMV
Sep-27-02	Research and Draft Pleadings Draft letter to C. Butt assertion that contract terms apply to current kids	0.30	\$275.00	82.50	CMV
Oct-02-02	Research and Draft Pleadings : research 1999 RFP terms, draft and revise letter to Chris Butt, DOE and E. Seitz re continued problems with DOE payment	1.30	\$275.00	357.50	CMV
Oct-03-02	Research and Draft Pleadings : draft letter to Chris Butt re recent payments, 1999 RFP, new rates and related issues	0.40	\$275.00	110.00	CMV
Oct-24-02	Research and Draft Pleadings Research and draft complaint	5.10	\$275.00	1,402.50	CMV
Oct-25-02	Research and Draft Pleadings : meeting with Loveland Academy owner, Patty Dukes to review and revise draft complaint	1.50	\$275.00	412.50	CMV
Oct-28-02	Research and Draft Pleadings : Telephone conference(s) with Loveland Academy owner, Patty Dukes re revisions to complaint	0.60	\$275.00	165.00	CMV
	Research and Draft Pleadings : revise complaint and make final revisions after consultation with client	3.70	\$275.00	1,017.50	CMV
Nov-08-02	Research and Draft Pleadings	0.50	\$275.00	137.50	CMV
Dec-12-02	Research and Draft Pleadings : draft complaint letter to DOE complaints office pursuant to state complaints procedures	0.40	\$275.00	110.00	CMV
Jan-25-03	Research and Draft Pleadings : scheduling conference statement and report of meeting of parties	1.25	\$275.00	343.75	CMV
Feb-22-03	Research and Draft Pleadings Draft parents' declarations in support of motion and discuss with client	2.00	\$275.00	550.00	CMV

	Research and Draft Pleadings : draft master parent declaration and discuss with client	1.20	\$275.00	330.00	CMV
Feb-26-03	Research and Draft Pleadings : review and revise parent JU's declaration	0.40	\$275.00	110.00	CMV
Mar-03-03	Research and Draft Pleadings : review and revise parent WO's declaration	0.50	\$275.00	137.50	CMV
Mar-14-03	Research and Draft Pleadings : File review, research and drafting settlement conference statement	2.00	\$275.00	550.00	CMV
Mar-15-03	Research and Draft Pleadings Continue drafting, research and file review for settlement conference statement	4.20	\$275.00	1,155.00	CMV
Mar-16-03	Research and Draft Pleadings Telephone conference with client to discuss settlement conference process and demand	0.30	\$275.00	82.50	CMV
Dec-01-03	Research and Draft Pleadings : review and revise settlement conference statement	2.20	\$275.00	605.00	CMV
Dec-02-03	Research and Draft Pleadings : discuss settlement conference statement with client and make final revisions	1.00	\$275.00	275.00	CMV
Feb-18-04	Research and Draft Pleadings Research and draft releases and assignments of right to seek reimbursement	1.20	\$275.00	330.00	CMV
Mar-04-04	Research and Draft Pleadings Begin research and drafting of PI memo, declarations and supporting exhibits	2.90	\$275.00	797.50	CMV
Mar-05-04	Research and Draft Pleadings Continue research and drafting on PI memo	7.10	\$275.00	1,952.50	CMV
Mar-06-04	Research and Draft Pleadings Continue research and drafting on PI memo	5.60	\$275.00	1,540.00	CMV
Mar-07-04	Research and Draft Pleadings Continue research and drafting PI memo and declarations for P Dukes and parents and attorneys	6.20	\$275.00	1,705.00	CMV
Mar-08-04	Research and Draft Pleadings Continue research and drafting PI memo and supporting declarations and review exhibits for inclusion	8.60	\$275.00	2,365.00	CMV

Mar-09-04	Research and Draft Pleadings Revise PI memorandum and declarations; review and revise billing summaries for J. B, G. K-R, J. R. and C. P-W; continue research of cases granting injunctive relief	4.60	\$275.00	1,265.00	CMV
	Research and Draft Pleadings : meeting with client to review and revise declaration, review supporting documents for PI motion	1.60	\$275.00	440.00	CMV
Mar-10-04	Research and Draft Pleadings Final research, revision and preparation of the PI memorandum and supporting documents for filing	5.90	\$275.00	1,622.50	CMV
	Research and Draft Pleadings : draft ex parte motions to shorten time and supporting documents	2.20	\$275.00	605.00	CMV
Mar-18-04	Research and Draft Pleadings Research and draft reply brief	4.10	\$275.00	1,127.50	CMV
Mar-19-04	Research and Draft Pleadings Complete researching and drafting reply and draft Gurtiza dec,	5.30	\$275.00	1,457.50	CMV
May-03-04	Research and Draft Pleadings Draft PT statement	1.90	\$275.00	522.50	CMV
	Research and Draft Pleadings Telephone conference(s) with client re A Schulaner objections to relief from bond	0.30	\$275.00	82.50	CMV
	Research and Draft Pleadings : draft response to objections	0.30	\$275.00	82.50	CMV
Nov-08-07	Research and Draft Pleadings : record review and first draft of response to Candon report	7.40	\$275.00	2,035.00	CMV
Nov-13-07	Research and Draft Pleadings : review client and CPA suggestions and revise response to Candon report	2.25	\$275.00	618.75	CMV
	Totals	135.25	\$37,111.25		
	Total Sales Tax on Fees		1,546.05		
	<b>Total Fee &amp; Disbursements</b>			<b>\$38,657.30</b>	

**Balance Now Due**

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**\$38,657.30**

Total Sales Tax \$1,546.05